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*Attorney for Defendant, Marla Mariscal-Sanabia*

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,  
Plaintiff,

vs.

ESPERANZA SANABIA-ARAUJO,  
MARLA MARISCAL-SANABIA,  
ARMANDO MARISCAL, and  
FERNANDO BUENO,

Defendants.

CASE NO.: 2:19-cr-00251-  
GMN-NJK

**UNOPPOSED MOTION TO  
MODIFY CONDITIONS OF  
PRETRIAL RELEASE**

COMES NOW, MARLA MARISCAL-SANABIA, by and through her counsel,  
Karen A. Connolly, and the United States through Susan Cushman, Assistant United  
States Attorney and files this Unopposed Motion to Modify Conditions of Pretrial  
Release. This request is based upon the Points and Authorities attached hereto.

Dated this 3<sup>rd</sup> day of April, 2020..

KAREN A. CONNOLLY, LTD

/s/ Karen A. Connolly  
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*Attorney for Defendant, Marla  
Mariscal-Sanabia*

**Points and Authorities**

1. On October 3, 2019, this court released Mrs. Mariscal-Sanabia on a personal recognizance bond with conditions.<sup>1</sup> One of the conditions required that Mrs. Sanabia submit to location monitoring with GPS and curfew.<sup>2</sup>

2. Mrs. Mariscal-Sanabia requests that the location monitoring condition (and its sub-conditions) be removed. She has been subject to location monitoring for approximately six months. She has been fully compliant with that condition as well as all her other conditions.

3. Undersigned counsel has been in contact with Mrs. Mariscal-Sanabia's pretrial officer, Samira Barlow. Mrs. Barlow has confirmed Mrs. Mariscal-Sanabia's compliance and has no opposition.

4. Ms. Barlow represented to undersigned counsel that the government also had no objection.

Dated this 3<sup>rd</sup> day of April, 2020

Respectfully Submitted,

Karen A. Connolly, Ltd.

By: /s/ Karen A. Connolly  
Karen A. Connolly  
Attorney for Marla Mariscal-Sanabia

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<sup>1</sup>ECF 25

<sup>2</sup>Id., (conditions 50A, 51D, 52, and 53.)

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9 *Attorney for Defendant, Marla Mariscal-Sanabia*

6  
7 **UNITED STATES DISTRICT COURT**  
8 **DISTRICT OF NEVADA**

9 UNITED STATES OF AMERICA,

10 Plaintiff,

11 vs.

12 ESPERANZA SANABIA-ARAUJO,  
13 MARLA MARISCAL-SANABIA,  
14 ARMANDO MARISCAL, and  
15 FERNANDO BUENO,

16 Defendants.

CASE NO.: 2:19-cr-00251-  
GMN-NJK

**PROPOSED ORDER**

17 IT IS ORDERED that Mrs. Mariscal-Sanabia's pretrial release conditions  
18 shall be modified to remove her location monitoring conditions (50A, 51D, 52,  
19 and 53).

20 DATED this 13th day of April 2020.

21   
22 UNITED STATES MAGISTRATE JUDGE  
23  
24  
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**CERTIFICATE OF ELECTRONIC SERVICE**

The undersigned hereby certifies that he is an employee of Karen A. Connolly, Ltd., and is a person of such age and discretion as to be competent to serve papers. That on April 3, 2020, he served an electronic copy of the above and foregoing Unopposed Motion to Modify Conditions of Pretrial Release by electronic service (ECF) to the person named below:

NICHOLAS A. TRUTANICH  
United States Attorney  
SUSAN CUSHMAN  
Assistant United States Attorney  
501 S. Las Vegas Blvd.  
Ste. 1100  
Las Vegas, NV 89101

/s/ Eric Siegler  
Employee of Karen A. Connolly, Ltd.